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of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**RESERVATION OF RIGHTS OF THE
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS REGARDING MOTION TO
EXTEND BAR DATE**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Date: November 13, 2019
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Docket No. 4292

The Official Committee of Unsecured Creditors (the “UCC”) appointed in the chapter 11 cases of the above-captioned debtors (the “Debtors”), hereby reserves all of its rights with respect

1 to the relief sought in the *Motion Pursuant to 11 U.S.C. §§ 105(b) and 501 and Fed. R. Bankr. P.*
2 *3003(c) for Entry of an Order Extending the Bar Date* (the “Bar Date Extension Motion”) [Docket
3 No. 4292],¹ including the right to be heard at the hearing on the Bar Date Extension Motion.

4 It is the UCC’s understanding that the Debtors and the Official Committee of Tort
5 Claimants (the “TCC”) have reached an agreement to extend the Bar Date for the wildfire victims
6 to December 31, 2019, as well as on certain additional notice procedures for the wildfire victims.
7 This agreement is being memorialized in a stipulation to be filed with the Court in advance of the
8 hearing. While the UCC believes a consensual resolution with respect to the Bar Date is preferable,
9 the UCC has to file this reservation of rights because it will not have sufficient time to review and
10 respond to the upcoming stipulation in advance of the objection deadline.
11

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13 Dated: November 6, 2019

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15 **MILBANK LLP**

16 /s/ Gregory A. Bray
17 DENNIS F. DUNNE
18 SAMUEL A. KHALIL
19 GREGORY A. BRAY
20 THOMAS R. KRELLER

21 *Counsel for the Official Committee of*
22 *Unsecured Creditors*
23
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28 ¹ Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Bar Date Extension Motion.